



CERTIFICATE OF MAIL

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to Mail Stop Appeal Brief-Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on November 7, 2005.

Sandra D. Hunter

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In Re Application of:

Date: November 7, 2005

Ruth Sarah DALY

Confirmation No: 8736

Serial No: 09/943,304

Group Art Unit: 2192

Filed: August 30, 2001

Examiner: Fowlkes, Andre R.

For: METHOD AND SYSTEM FOR INCREMENTAL ACTIONS RELATING TO
NOTIFY AND TARGET MODELS

APPEAL BRIEF

11/14/2005 DTESSEM1 00000013 090460 09943304

01 FC:1402 500.00 DA

Joseph A. Sawyer, Jr.
Attorney for Appellant
Sawyer Law Group, LLP
2465 E. Bayshore Road, Suite 406
Palo Alto, CA 94303

TABLE OF CONTENTS

I.	REAL PARTY IN INTEREST.....	1
II.	RELATED APPEALS AND INTERFERENCES.....	2
III.	STATUS OF CLAIMS.....	3
IV.	STATUS OF AMENDMENT.....	4
V.	SUMMARY OF CLAIMED SUBJECT MATTER.....	5
VI.	GROUND OF REJECTION TO BE REVIEWED ON APPEAL.....	8
VII.	ARGUMENTS.....	9
	A. Summary of the Applied Rejections.....	9
	B. The Cited Prior Art.....	12
	C. Independent claims 1, 9, 16, 23, 25, and 27 are allowable over AAPA.....	14
	D. Summary of Arguments.....	18
	APPENDIX A.....	i
	APPENDIX B (EVIDENCE - NONE).....	viii
	APPENDIX C (RELATED PROCEEDINGS – NONE)	ix

I. REAL PARTY IN INTEREST

Appellant respectfully submits that International Business Machines Corporation is the real party in interest.

II. RELATED APPEALS AND INTERFERENCES

Appellant states that no such proceeding exists.



III. STATUS OF CLAIMS

Claims 1-27 are pending and stand rejected. Accordingly, claims 1-27 are on appeal and all applied rejections concerning those claims are herein being appealed.

IV. STATUS OF AMENDMENT

Application Serial No. 09/943,304 (the instant application) as originally filed included claims 1-27. Claims 1-27 are pending. Claims 1-27 are on appeal and all applied prospective rejections concerning claims 1-27 are being appealed herein. All amendments made to the instant application have been entered.

V. SUMMARY OF CLAIMED SUBJECT MATTER

The present invention provides a method and system for incremental actions relating to notify and target models. In a preferred embodiment, a target model includes target objects, and a notify model includes notify objects. The system and method include a model map for mapping each of the notify objects to an associated target object, and an action operator for performing an action on one or more target objects in the target model in response to a modification of a selected notify object. In the system and method, the action operator performs the action on one or more identified target objects associated with the modified selected notify object, the one or more identified target objects being determined with reference to the model map.

By utilizing the present invention, only the objects in the target model affected by the changes in the notify model are identified. Thus, the action (e.g., a validation check) is performed only on the affected parts of the target model. Advantageously, the incremental nature of this action identifies problems sooner, because the action can be run more often, since, given less input, it will not take as much time to complete. When problems are identified sooner, there is less opportunity for other code to become dependent on faulty behavior, and thus less chance that the fix for faulty behavior will break other code. Consequently, this incremental nature of the action performed results in reduced time and thus increases the efficiency of a developer a development time.

Independent claim 1 recites a computer system for performing an action on a target model, wherein the target model is associated with a notify model, the target model comprising target objects and the notify model comprising notify objects. The computer system comprises: a

model map for mapping the notify objects of the notify model to associated target objects in the target model; and an action operator for performing the action on one or more target objects in the target model in response to a modification of a selected notify object; wherein, the action operator performs the action on one or more identified target objects associated with the modified selected notify object, the one or more identified target objects being determined with reference to the model map.

Independent claim 9 recites a method for performing for an action on a target model, wherein the target model is associated with a notify model, the target model comprising target objects and the notify model comprising notify objects. The method comprises: a) mapping the notify objects of the notify model to associated target objects in the target model; and b) performing the action on one or more identified target objects associated with the selected notify object in response to modifying a selected notify object, the one or more identified target objects being determined with reference to the mapping.

Independent claim 16 recites a computer readable medium containing program instructions for performing for an action on a target model, wherein the target model is associated with a notify model, the target model comprising target objects and the notify model comprising notify objects. The program instructions are for: a) mapping the notify objects of the notify model to associated target objects in the target model; and b) performing the action on one or more identified target objects associated with the selected notify object in response to modifying a selected notify object, the one or more identified target objects being determined with reference to the mapping.

Independent claim 23 recites a data signal carrier carrying computer data and instructions for performing for an action on a target model, wherein the target model is associated with a

notify model, the target model comprising target objects and the notify model comprising notify objects. The instructions are for: mapping the notify objects of the notify model to associated target objects in the target model; and performing the action on one or more identified target objects associated with the selected notify object in response to modifying a selected notify object, the one or more identified target objects being determined with reference to the mapping.

Independent claim 25 recites a source code validator for validating source code forming a target object in a target model, the target model comprising a plurality of target objects, the target model associated with a notify model, wherein notify objects comprising the notify model are associated with one or more target objects in the target model and wherein modifications to a notify object in the notify model are propagated to one or more target objects in the target model.

The source code validator is for: performing code validation on one or more identified target objects associated with a selected notify object, the one or more identified target objects being determined with reference to a map of the associations between the notify objects in the notify model and the target objects in the object model.

Independent claim 27 recites a method for performing an action on at least one of a target model and a notify model, wherein the at least one target model is associated with the notify model, the target model comprising target objects and the notify model comprising notify objects. The method comprises the steps of: a) mapping the notify objects of the notify model to associated target objects in the target model; and b) performing the action on a selected notify object and an identified target object associated with the selected notify object, the identified target object determined with reference to the mapping.

Support for independent claims 1, 9, 16, 23, 25, and 27 is found in the combination of Figures 3, 4, and 5, page 11, line 2, to page 15, line 5.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Appellant respectfully seeks review of the following rejections:

1. Claims 1-3, 9, 10, 12, 13, 16, 17, 19, 20, 23 and 27 are rejected under 35 U.S.C. 102(a) as being anticipated by applicant's admitted prior art (AAPA).
2. Claims 4-8, 11, 14, 15, 18, 21, 22, 24-26 are rejected under 35 U.S.C. 103(a) as being unpatentable over applicant's admitted prior art (AAPA) in view of Atkinson.



VII. ARGUMENTS

A. Summary of the Applied Rejections

The Final Office Action dated May 19, 2005 rejected claims 1-3, 9-10, 12-13, 16-17, 19-20, 23, and 27 under 35 U.S.C. 102(a) as being anticipated by applicant's admitted prior art, (AAPA). In making the rejection, the Examiner stated:

Claims 1-3, 9, 10, 12, 13, 16, 17, 19, 20, 23 and 27 are rejected under 35 U.S.C. 102(a) as being anticipated by applicants admitted prior art, (AAPA), in the background section of the instant application. The paragraph and line numbers of the PGPUB application are used to cite the reference.

As per claim 1, AAPA discloses a computer system for performing an action on a target model, wherein the target model is associated with a notify model, the target model comprising target objects and the notify model comprising notify objects (§10:1-11:9, "It is known to those skilled in the art that programming code can be written, especially in object-oriented languages, to receive event notifications (i.e., the programming code is notified (to perform an action) when certain changes occur). Depending on the context, both source models and object models can be either a notify model, or a target model.... (for example), a file in the source model is changed and an object model is modified in response to the file change. In this first exemplary scenario the source model is the notify model, and the object model is the target model"), the computer system comprising:

-a model map for mapping the notify objects of the notify model to associated target objects in the target model (§11:5-9, "(for example), a file in the source model is changed and an object model is (automatically) modified in response to the file change. In this first exemplary scenario the source model is the notify model, and the object model is the target model", and the notify model must be mapped to the target model in order for the cited situation to occur),

-an action operator for performing the action on one or more target objects in the target model in response to a modification of a selected notify object (§11:5-9, "a file in the source model is changed and an object model is modified, (using an action operator), in response to the file change. In this first exemplary scenario the source model is the notify model, and the object model is the target model", and, §12:1-3, "a single instance of a notify model may consist of several models. Similarly, an instance of a target model may also consist of several models")

-wherein, the action operator performs the action on one or more identified target objects associated with the modified selected notify object, the one or more identified target objects being determined with reference to the model map (§11:5-9, "(for example), a file in the source model is changed and an object model is (automatically) modified, (using an action operator), in response to the file change. In this first exemplary scenario the source model is the notify model, and the object model is the target model", and the notify models must be mapped to the target models in order for the cited situation to occur).

As per claim 2, the rejection of claim 1 is incorporated and further, AAPA

discloses that the notify model is a model of an object in an object oriented computer language and wherein the target model is source code associated with the object (¶11:7-9, "In this first exemplary scenario the source model is the notify model, and the object model is the target model").

As per claim 3, the rejection of claim 1 is incorporated and further, AAPA discloses means for generating an event notification signal when the selected notify object is modified, wherein the action operator performs the action responsive to receipt of the event notification signal (¶10:1-11:9, "It is known to those skilled in the art that programming code can be written, especially in object-oriented languages, to receive event notifications (i.e., the programming code is notified (to perform an action, using the action operator) when certain changes occur)").

As per claims 9, 10, 12, 13 and 27, this is a method version of the claimed system discussed above, in claims 1-3, wherein all claimed limitations have also been addressed and/or cited as set forth above. For example, see AAPA, ¶10:1-12:3.

As per claims 16, 17, 19 and 20, this is a computer readable medium version of the claimed system discussed above, in claims 1-3, wherein all claimed limitations have also been addressed and/or cited as set forth above. For example, see AAPA ¶10:1-12:3.

As per claim 23, this is a product version of the claimed system discussed above, in claims 1-3, wherein all claimed limitations have also been addressed and/or cited as set forth above. For example, see AAPA, ¶10:1-12:3.

The Examiner stated the following in response to the previous arguments against these rejections:

Applicants arguments have been considered but they are not persuasive.

In the remarks, the applicant has argued substantially that:

AAPA fails to teach, show, or suggest the recited mapping of notify objects of a notify model to associated target objects of a target model, at p. 12:19-13:4.

Examiner's response:

The examiner disagrees with applicant's characterization of the applied art. AAPA does disclose the recited mapping of notify objects of a notify model to associated target objects of a target model. AAPA, ¶11 discloses several practical examples of the mapping of notify objects of a notify model to associated target objects of a target model.

In the remarks, the applicant has argued substantially that:

The model modification of AAPA fails to teach, show, or suggest such object identification and action through the use of mapping, as occurs in the recited invention at p. 13:6-16.

Examiner's response:

The examiner disagrees with applicant's characterization of the applied art.

AAPA discloses object identification and action through the use of mapping, as occurs instant application. AAPA, ¶11 discloses several practical examples of object identification and action through the use of mapping.

The Final Office Action dated May 19, 2005 also rejected claims 4-8, 11, 14, 15, 18, 21, 22, and 24-26 under 35 U.S.C. 103(a) as being unpatentable over applicant's admitted prior art, (AAPA) in view of Atkinson. In making the rejection, the Examiner stated:

Claims 4-8, 11, 14, 15, 18, 21, 22, 24-26 are rejected under 35 U.S.C. 103(a) as being unpatentable over applicants admitted prior art, (AAPA), in the background section of the instant application in view of Atkinson et al., (Atkinson), U.S. Patent no. 5,613,124.

As per claim 4, the rejection of claim 1 is incorporated and further, AAPA doesn't explicitly disclose that the model map is one of a lookup table and a database.

However, Atkinson, in an analogous environment, discloses that the model map is one of a lookup table and a database (col. 3:36-39, "The virtual function table (i.e. lookup table) contains an entry (which maps a relationship) for each virtual function member defined for the object. Each entry contains a reference to the code that implements the corresponding function member").

Therefore, it would have been obvious to a person of ordinary skill in the art, at the time the invention was made, to incorporate the teachings of Atkinson into the system of AAPA to have the model map as a lookup table or a database. The modification would have been obvious because one of ordinary skill in the art would want to use the well known lookup table or database in order to store and retrieve data, involved in complex relationships, in an organized and efficient fashion.

As per claim 5, the rejection of claim 4 is incorporated and further, AAPA doesn't explicitly disclose that the model map maps portions of the notify objects to associated portions of the target objects.

However, Atkinson, in an analogous environment, discloses that the model map maps portions of the notify objects to associated portions of the target objects (col. 33:31-33, "information that indicates which portion of the object is to be used for generating the (portion) of the presentation data", additionally, the AAPA and Atkinson references are directed toward object oriented technologies, wherein separating objects into their constituent parts, maintaining complex relationships involving objects and their constituent parts, and modification and the propagation of modifications involving objects and their constituent parts (without affecting the rest of the application) are common, well know techniques).

Therefore, it would have been obvious to a person of ordinary skill in the art, at the time the invention was made, to incorporate the teachings of Atkinson into the system of AAPA to have a model map that maps portions of the notify objects to associated portions of the target objects. The modification would have been obvious because one of ordinary skill in the art would want to exploit the numerous advantages of object oriented technologies (e.g. minimizing the time or coding effort required to produce an application relying on the notify and target object relationship).

As per claim 6, the rejection of claim 5 is incorporated and further, AAPA discloses that the action performed by the action operator is performed on the identified portions of the target objects in the target model, the identified portions of the target being determined with reference to the model map (¶11:5-9, "(for example), a file in the source model is changed and an object model is modified, (using an action operator), in response to the file change. In this first exemplary scenario the source model is the notify model, and the object model is the target model", and the portion of the notify model must be mapped to the portion of the

target model in order for the cited situation to occur, additionally, the AAPA reference is directed toward object oriented technologies, wherein separating objects into their constituent parts, maintaining complex relationships involving objects and their constituent parts, and modification and the propagation of modifications involving objects and their constituent parts (without affecting the rest of the application) are common, well know techniques).

As per claim 7, the rejection of claim 6 is incorporated and further, AAPA discloses that the notify model is a model of an object in an object oriented language and wherein the target object is source code (¶11:11-12, "In this second exemplary scenario the object model is the notify model, and the source model is the target model").

As per claim 8, the rejection of claim 7 is incorporated and further, AAPA discloses that the action performed is a source code validation(¶18:1-3, "Presently, when a change in a notify model is completed, testing of the model (e.g., validating source code or the EJB in the examples described above, respectively) is (the action that is) conducted").

As per claims 11, 14, 15, 18, 21, 22 and 24, the AAPA/Atkinson combination also discloses such claimed limitations as addressed in claims 4 and 8 above.

As per claims 25-26, this is a product version of the claimed system discussed above, in claim 8, wherein all claimed limitations have also been addressed and/or cited as set forth above. For example, see AAPA, ¶18:1-3.

The Examiner stated the following in the Advisory Action dated August 9, 2005:

Applicants arguments presented have been considered but they are not persuasive. ...

Appellants respectfully request that the Board reverse the Examiner's final rejection of the pending claims.

B. The Cited Prior Art

AAPA discloses a target model that changes when a notify model is changed. A "notify model" is used to represent a model(s) which, when changed, results in a signal, known as an "event notification", being issued which indicates that a change has occurred. A "target model" is used to represent a model(s) which, when a change has occurred in the notify model, either changes in response to the change in the notify model or is changed concurrently with the change in the notify model. The notification of a change only operates in one direction from the notify model to the target model. Applications assist developers in generating code which, for many

functions, is relatively easy to complete but quite time consuming to code and test. As a result of the laborious nature of producing some code, automatic code generators have been created. These automatic code generators, which often use a visual representation, or model, of the desired output, generate code which represents the graphical model produced. When a change in a notify model is completed, testing of the model (e.g. validating source code) is conducted against the complete target model. Additionally, testing of the target model (e.g. validation of an object model) is commenced by a user command. This process can be extremely time consuming. Additionally, the user may fail to invoke the testing of the target model. As a result, testing of the code is often delayed to the end of the development cycle. Delaying testing often results in defects, which could have been rectified earlier in the development cycle, but are instead identified late in the development cycle. Unfortunately, the problem is exacerbated when additional code, which depends on the defects in the original code, has been developed in the interim. (Background)

Atkinson discloses a method and system for retrieving and maintaining presentation data in a presentation cache is provided. In a preferred embodiment, a presentation cache object provides a presentation cache with multiple cache entries. Each entry contains an indication of the format of the presentation data and the presentation data stored in that particular format. In addition, other information, such as the advisees of advisory connections for notification of cache updates, can be maintained. The presentation cache object responds to requests for retrieving source object data by returning presentation data cached within the presentation cache when it is available. In addition, the presentation cache object determines when it should delegate requests to the source object and when it can satisfy them on its own. The presentation cache object can return presentation data to a requesting client program even if the server program implementing

the source object is unavailable or not running. The presentation cache object can also choose to persistently store its cache entries so that the presentation cache is maintained when the source object is closed. In addition, client programs can provide control over the frequency and subject of presentation data updates within the presentation cache. (Abstract.)

C. Independent claims 1, 9, 16, 23, 25, and 27 are allowable over AAPA

The present invention provides a method and system for incremental actions relating to notify and target models. In a preferred embodiment, a target model includes target objects, and a notify model includes notify objects. The system and method include a model map for mapping each of the notify objects to an associated target object, and an action operator for performing an action on one or more target objects in the target model in response to a modification of a selected notify object. In the system and method, the action operator performs the action on one or more identified target objects associated with the modified selected notify object, the one or more identified target objects being determined with reference to the model map.

By utilizing the present invention, only the objects in the target model affected by the changes in the notify model are identified. Thus, the action (e.g., a validation check) is performed only on the affected parts of the target model. Advantageously, the incremental nature of this action identifies problems sooner, because the action can be run more often, since, given less input, it will not take as much time to complete. When problems are identified sooner, there is less opportunity for other code to become dependent on faulty behavior, and thus less chance that the fix for faulty behavior will break other code. Consequently, this incremental nature of the action performed results in reduced time and thus increases the efficiency of a developer a

development time. Applicants admitted prior art (AAPA) does not teach or suggest these features, as discussed below.

AAPA does not teach or suggest the combination of “a model map for mapping the notify objects of the notify model to associated target objects in the target model,” and “an action operator for performing the action on one or more target objects in the target model in response to a modification of a selected notify object,” wherein “the action operator performs the action on one or more identified target objects associated with the modified selected notify object, the one or more identified target objects being determined with reference to the model map,” as recited in independent claim 1. The Examiner has argued that AAPA discloses several practical examples of object identification and action through the use of mapping, referring to paragraph 11 of the specification. However, nowhere does paragraph 11 specifically state that there is a mapping of notify objects of a notify model to associated target objects of a target model. Specifically, paragraph 11 states:

Depending on the context, both source models and object models can be either a notify model, or a target model. To assist in the understanding of the notify and target models, the following examples illustrate three scenarios. In the first exemplary scenario, a file in the source model is changed and an object model is modified in response to the file change. In this first exemplary scenario the source model is the notify model, and the object model is the target model. In a second exemplary scenario a developer's tool changes an object model which causes new source code files to be created. In this second exemplary scenario the object model is the notify model, and the source model is the target model. In a third exemplary scenario source code is used as input for a tool. The tool generates new source code files, and, due to the existence of new code, an object model is updated. In this third exemplary scenario, the source code is both a notify and target model, and the object model is a target model.

The Examiner fails to point out specifically where the description of AAPA mentions a “model map,” as recited in the present invention. The Examiner also fails to point out specifically where the description of AAPA mentions that an “action operator” performs an

“action on one or more identified target objects,” which are “determined with reference to the model map,” as recited in the present invention. In one example, AAPA mentions that “a file in the source model is changed and **an object model is modified** in response to the file change” (page 3, lines 6-8). However, the modification of the object model is only **generally** described. There is no specific teaching as to how the object model is modified. In a second example and in a third example, AAPA mentions that new source code files are created when there are changes in an object model. In both of these examples, there is no specific mention that an existing source model is modified, or if one is modified, how it is modified. Clearly, all three examples do not specifically teach or suggest a model map that is utilized for the modification or how a model map would be utilized. Clearly, all three examples do not specifically teach or suggest that an action is specifically taken on one or more “identified target objects,” which are “determined with reference to the model map,” as recited in the present invention.

Furthermore, in accordance with the present invention, action (e.g., a validation check) is performed only on the affected parts of the target model. AAPA teaches that when a change in a notify model is completed, the testing of the model is conducted “against the **complete** target model.” Clearly, action on the complete target model as taught by AAPA is different from action taken on only the one or more “identified target objects,” which are “determined with reference to the model map,” as recited in the present invention.

Accordingly, since AAPA does not teach or suggest the cooperation of elements as recited in the present invention. Therefore, claim 1 is allowable over AAPA.

Similar to independent claim 1, independent claims 9, 16, 23, and 27 recite the “mapping the notify objects of the notify model to associated target objects in the target model,” and performing an “action on one or more identified target objects,” which are “determined with

reference to the mapping. As described above, with respect to independent claim 1, AAPA does not teach or suggest these features. Accordingly, the above-articulated arguments related to independent claim 1 apply with equal force to claims 9, 16, 23, and 27. Therefore, claims 9, 16, 23, and 27 are allowable over AAPA for at least the same reasons as claim 1.

Similar to independent claim 1, independent claim 25 recites “performing code validation on one or more identified target objects associated with a selected notify object, the one or more identified target objects being determined with reference to a map of the associations between the notify objects in the notify model and the target objects in the object model.” As described above, with respect to independent claim 1, AAPA does not teach or suggest these features. Instead, AAPA teaches that when a change in a notify model is completed, the testing of the model is conducted “against the **complete** target model.” Accordingly, the above-articulated arguments related to independent claim 1 apply with equal force to claim 25. Therefore, claim 25 is allowable over AAPA for at least the same reasons as claim 1.

Dependent claims 2-3, 10, 12-13, 17, and 19-20 depend from independent claims 1, 9, 16, 23, and 27, respectively. Accordingly, the above-articulated arguments related to independent claims 1, 9, 16, 23, and 27 apply with equal force to claims 2-3, 10, 12-13, 17, and 19-20, which are thus allowable over the cited reference for at least the same reasons as claims 1, 9, 16, 23, and 27.

Dependent claims 4-8, 11, 14-15, 18, 21-22, and 24-26 depend from independent claims 1, 9, 16, 23, 25, and 27, respectively. Accordingly, the above-articulated arguments related to independent claims 1, 9, 16, 23, 25, and 27 apply with equal force to claims 4-8, 11, 14-15, 18, 21-22, and 24-26, which are thus allowable over the cited reference for at least the same reasons as claims 1, 9, 16, 23, 25, and 27.

Furthermore, with regard to dependent claims 4, 14, and 26, the Examiner has relied upon Atkinson to cure the defects of AAPA, which does not describe that the “model map is one of a lookup table and a database,” as recited in the present invention. However, Atkinson merely describes a “virtual function table” (column 3, lines 36-39). While the virtual function table of Atkinson may be interpreted as a look up table, there is no mention as to whether the virtual function table (or even a database) can be utilized as the model map of the present invention, which specifically maps notify objects to associated target objects. As argued above, AAPA does not teach or suggest the model map or how it functions.

Accordingly, AAPA in view of Atkinson does not teach or suggest the cooperation of elements as recited in dependent claims 4, 14, and 26. Therefore, claims 4, 14, and 26 are allowable over AAPA in view of Atkinson for at least these reasons.

In view of the foregoing, Applicant respectfully submits that the recited invention is not taught, shown, or suggested by the cited art.

Accordingly, Appellant respectfully requests withdrawal of the rejections under 35 U.S.C. 102(a) and 103(a) and respectfully requests that the Board reverse the final rejection of claims.

D. Summary of Arguments

For all the foregoing reasons, it is respectfully submitted that claims 1-27 (all of the claims presently in the application) are patentable for defining subject matter, which would not have been unpatentable under 35 U.S.C. §102(a) and §103(a) at the time the subject matter was invented. Thus, Appellants respectfully request that the Board reverse the rejection of all the appealed claims and find each of these claims allowable.

Note: For convenience of detachment without disturbing the integrity of the remainder of pages of this Appeal Brief, Appellants' APPENDICES A-C are attached on separate sheets following the signatory portion of this Appeal Brief.

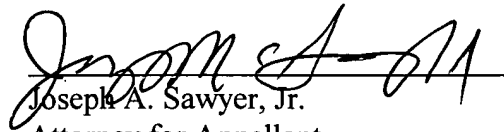
Please charge any fee that may be necessary for the continued pendency of this application to Deposit Account No. 09-0460 (IBM Corporation).

Respectfully submitted,

SAWYER LAW GROUP LLP

November 7, 2005

Date

A handwritten signature in black ink, appearing to read "Joseph A. Sawyer, Jr.", written over a horizontal line.

Joseph A. Sawyer, Jr.

Attorney for Appellant

Reg. No. 30,801

(650) 493-4540



APPENDIX A

CLAIMS

1. (Original) A computer system for performing an action on a target model, wherein the target model is associated with a notify model, the target model comprising target objects and the notify model comprising notify objects, the computer system comprising:

a model map for mapping the notify objects of the notify model to associated target objects in the target model; and

an action operator for performing the action on one or more target objects in the target model in response to a modification of a selected notify object;

wherein, the action operator performs the action on one or more identified target objects associated with the modified selected notify object, the one or more identified target objects being determined with reference to the model map.

2. (Original) The computer system of claim 1 wherein the notify model is a model of an object in an object oriented computer language and wherein the target model is source code associated with the object.

3. (Original) The computer system of claim 1 further comprising means for generating an event notification signal when the selected notify object is modified, wherein the action operator performs the action responsive to receipt of the event notification signal.

4. (Original) The computer system of claim 1 wherein the model map is one of a

lookup table and a database.

5. (Original) The computer system of claim 4 wherein the model map maps portions of the notify objects to associated portions of the target objects.

6. (Currently amended) The computer system of claim 5 wherein, the action performed by the action operator is performed on the identified portions of the target objects in the target model, the identified portions of the target object being determined with reference to the model map.

7. (Original) The computer system of claim 6 wherein the notify model is a model of an object in an object oriented language and wherein the target object is source code.

8. (Original) The computer system of claim 7 wherein the action performed is a source code validation.

9. (Currently amended) A method for performing for an action on a target model, wherein the target model is associated with a notify model, the target model comprising target objects and the notify model comprising notify objects, the method comprising:

a) mapping the notify objects of the notify model to associated target objects in the target model; and

b) performing the action on one or more identified target objects associated with the

selected notify object in response to modifying a selected notify object, the one or more identified target objects being determined with reference to the mapping.

10. (Original) The method of claim 9 wherein the mapping step (a) comprises the step of:

a1) collecting data corresponding to linkages between the notify objects and the target objects.

11. (Original) The method of claim 10 wherein the mapping step (a) further comprises the step of:

a2) storing the data collected in one of a lookup table and a database.

12. (Currently amended) The method of claim 9 further comprising the step of:

c) receiving event notification data identifying the selected notify object prior to the performing the action,.

13. (Original) The method of claim 10 wherein the reference to the mapping comprises retrieving target identity data identifying the one or more target objects associated with the selected notify object from the mapping.

14. (Original) The method of claim 9 wherein the mapping generates one of a lookup table and a database.

15. (Original) The method of claim 9 wherein the action performed on the one or more identified target objects comprises code validation.

16. (Original) A computer readable medium containing program instructions for performing for an action on a target model, wherein the target model is associated with a notify model, the target model comprising target objects and the notify model comprising notify objects, the program instructions for:

- a) mapping the notify objects of the notify model to associated target objects in the target model; and
- b) performing the action on one or more identified target objects associated with the selected notify object in response to modifying a selected notify object, the one or more identified target objects being determined with reference to the mapping.

17. (Original) The computer readable medium of claim 16 wherein the mapping instruction (a) comprises instructions for collecting data corresponding to linkages between the notify objects and the target objects.

18. (Original) The computer readable medium of claim 17 wherein the mapping instructions (a) further comprise storing the data collected in one of a lookup table and a database.

19. (Currently amended) The computer readable medium of claim 16 further comprising the instruction for:

c) receiving event notification data identifying the selected notify object prior to the performing the action,.

20. (Original) The computer readable medium of claim 17 wherein the performing instruction comprises retrieving target identity data identifying the one or more target objects associated with the selected notify object from the mapping.

21. (Original) The computer readable medium of claim 16 wherein the mapping instruction generates one of a lookup table and a database.

22. (Original) The method of claim 16 wherein the action performed on the one or more identified target objects comprises code validation.

23. (Original) A data signal carrier carrying computer data and instructions for performing for an action on a target model, wherein the target model is associated with a notify model, the target model comprising target objects and the notify model comprising notify objects, the instructions for:

mapping the notify objects of the notify model to associated target objects in the target model; and

performing the action on one or more identified target objects associated with the selected notify object in response to modifying a selected notify object, the one or more identified target objects being determined with reference to the mapping.

24. (Original) The data signal carrier of claim 23 wherein the action is code validation on the one or more identified target objects.

25. (Original) A source code validator for validating source code forming a target object in a target model, the target model comprising a plurality of target objects, the target model associated with a notify model, wherein notify objects comprising the notify model are associated with one or more target objects in the target model and wherein modifications to a notify object in the notify model are propagated to one or more target objects in the target model, the source code validator for:

performing code validation on one or more identified target objects associated with a selected notify object, the one or more identified target objects being determined with reference to a map of the associations between the notify objects in the notify model and the target objects in the object model.

26. (Original) The source code validator of claim 25 for collecting and storing data corresponding to linkages between the notify objects and the target objects in one of a lookup table and a database.

27. (Original) A method for performing an action on at least one of a target model and a notify model, wherein the at least one target model is associated with the notify model, the target model comprising target objects and the notify model comprising notify objects, the method comprising the steps of:

- a) mapping the notify objects of the notify model to associated target objects in the

target model; and

b) performing the action on a selected notify object and an identified target object associated with the selected notify object, the identified target object determined with reference to the mapping.

APPENDIX B

EVIDENCE

(NONE)

APPENDIX C
RELATED PROCEEDINGS
(NONE)

TRANSMITTAL FORM

Attorney Docket No.
CA920010013US1
2179P

In re the application of: **Ruth S. Sawyer, Jr.**

Confirmation No: **8736**

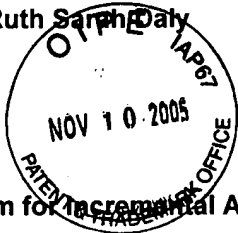
Serial No: **09/943,304**

Group Art Unit: **2192**

Filed: **August 30, 2001**

Examiner: **Fowlkes, Andre R.**

For: **Method and System for Incremental Actions Relating to Notify and Target Models**



ENCLOSURES (check all that apply)					
<input type="checkbox"/>	Amendment/Reply	<input type="checkbox"/>	Assignment and Recordation Cover Sheet	<input type="checkbox"/>	After Allowance Communication to Group
<input type="checkbox"/>	After Final	<input type="checkbox"/>	Part B-Issue Fee Transmittal	<input type="checkbox"/>	Notice of Appeal
<input type="checkbox"/>	Information disclosure statement	<input type="checkbox"/>	Letter to Draftsman	<input checked="" type="checkbox"/>	Appeal Brief
<input type="checkbox"/>	Form 1449	<input type="checkbox"/>	Drawings	<input type="checkbox"/>	Status Letter
<input type="checkbox"/>	(X) Copies of References	<input type="checkbox"/>	Petition	<input checked="" type="checkbox"/>	Postcard
<input type="checkbox"/>	Extension of Time Request *	<input type="checkbox"/>	Fee Address Indication Form	<input type="checkbox"/>	Other Enclosure(s) (please identify below):
<input type="checkbox"/>	Express Abandonment	<input type="checkbox"/>	Terminal Disclaimer		
<input type="checkbox"/>	Certified Copy of Priority Doc	<input type="checkbox"/>	Power of Attorney and Revocation of Prior Powers		
<input type="checkbox"/>	Response to Incomplete Appln	<input type="checkbox"/>	Change of Correspondence Address		
<input type="checkbox"/>	Response to Missing Parts	*Extension of Term: Pursuant to 37 CFR 1.136, Applicant petitions the Commissioner to extend the time for response for xxxxx month(s), from to .			
<input type="checkbox"/>	Executed Declaration by Inventor(s)				

CLAIMS					
FOR	Claims Remaining After Amendment	Highest # of Claims Previously Paid For	Extra Claims	RATE	FEE
Total Claims	27	27	0	\$ 50.00	\$ 0.00
Independent Claims	6	6	0	\$200.00	\$ 0.00
Total Fees					\$ 0.00

METHOD OF PAYMENT	
<input type="checkbox"/>	Check no. _____ in the amount of \$ _____ is enclosed for payment of fees.
<input checked="" type="checkbox"/>	Charge \$ <u>500.00</u> to Deposit Account No. <u>09-0460</u> (IBM Corporation) for payment of fees.
<input checked="" type="checkbox"/>	Charge any additional fees or credit any overpayment to Deposit Account No. <u>09-0460</u> (IBM Corporation)

SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT	
Attorney Name	Joseph A. Sawyer, Jr., Reg. No. 30,801
Signature	
Date	November 7, 2005

CERTIFICATE OF MAILING	
I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop Appeal Brief-Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on November 7, 2005	
Type or printed name	Saundra D. Hunter
Signature	